

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Michael Carrabes,

Plaintiff,

v.

Expeditors International of
Washington, Inc.,

Defendant.

No. 1:24-CV-12142-AK

AFFIDAVIT OF MICHAEL CARRABES

I, Michael Carrabes, depose and state as follows:

1. My name is Michael Carrabes. I am the named plaintiff in this matter and submit this affidavit in support of my request that the issue of threats made against me and Christina Boudreau, who has a related case pending before this court (1:25-cv-10300), by Brian Carrabes, whom I am seeking to join as a defendant in this action, be added to the agenda for the upcoming scheduling conference in this matter.
2. I have personal knowledge of the facts set forth in this affidavit, and if called upon to testify, I could and would testify competently to these facts.

3. On the evening of November 3, 2024, my former sister-in-law, Fran Carrabes, who was married to Brian Carrabes, called me. I did not answer her call at the time.
4. On the morning of November 4, 2024, I noticed that Fran had left me a message asking me to call her because it was important. Shortly thereafter, I received a call from my niece, Ally Carrabes, Brian's daughter, but I did not pick up because I was working.
5. At approximately 10:00 a.m. on November 4, 2024, I returned Fran's call. She asked if I was okay and informed me that Ally was out to dinner with her boyfriend the previous night, on November 3, 2024, at La Fina restaurant in Andover, Massachusetts, when Brian stormed into the restaurant and threatened to kill me and Christina.
6. After my call with Fran, I called Ally to check on her. Ally sounded shaken and asked if I was okay.
7. Ally recounted the incident, explaining that while she was having dinner with her boyfriend, Brian stormed into the restaurant. He was yelling and said he was going to "slice [my] throat and Christina's throat and watch [us]

bleed out.” Brian also tried to coerce Ally into texting these threats to me, but she told me she refused.

8. Ally stated that Brian then told her he loved her and his children but that he was likely going to end up on the news and would be going to jail.
9. This incident has caused me significant emotional distress, especially given the ongoing litigation and the escalating nature of Brian’s behaviour.
10. In light of the Defendant’s request to address the issue of anonymous emails and recordings at the scheduling conference, I respectfully request that the issue of Brian’s threats to kill me and Christina also be added to the agenda for the scheduling conference.
11. This issue is directly relevant to this case, as the threats stem from the ongoing litigation and involve individuals directly connected to the events at issue in this matter.

Signed under the pains and penalties of perjury this 12th
day of February 2025.

A handwritten signature in black ink, appearing to read 'Michael Carrabes', written in a cursive style.

Michael Carrabes